P- Permits, GW- Ground Water C- Closura E-Enforcement

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Asheville Dyeina + Finishina

409 Rogers View Court | Raleigh | North Carolina | 27610 800-486-7568 | 919-250-9918 | 919-250-9950 Facsimile www.maaonline.com

August 4, 1999

Mr. Rachael Grover, Hydrogeologist
North Carolina Department of Environment and Natural Resources
Division of Solid Waste Management
Hazardous Waste Section
1637 Mail Service Center
Raleigh, North Carolina 27699-1637

Reference:

AMENDED PART A HAZARDOUS WASTE PERMIT APPLICATION

ASHEVILLE DYEING AND FINISHING SWANNANOA, NORTH CAROLINA

NCDO70619663

Dear Ms. Grover:

On June 24, 1999, Mid-Atlantic Associates, on behalf of Culligan International, submitted an amended Part A Hazardous Waste Permit Application for the above referenced site. As part of the amended application, page 2 of the old application was mistakenly included on the back of page 1. As such, a copy of page 1 of the application has been included as an attachment to this letter. Therefore, please discard the previously submitted page 1 and insert the attached copy.

If you should have questions, please do not hesitate to call me at (919) 250-9918.

Sincerely,

MID-ATLANTIC ASSOCIATES, P.A.

Kirk B. Pollard, P.G.

Senior Project Manager

Kirk B. Vollard

Cc:

Mr. Jason Pontnack - Culligan International

Enclosure

L99-1668/KBP/aso



409 Rogers View Court / Raleigh / North Carolina / 27610 800-486-7568/ 919-250-9918/ 919-250-9950 Facsimile www.maaonline.com

June 24, 1999

Ms. Rachel Grover, Hydrogeologist North Carolina Department of Environment and Natural Resources Division of Waste Management Hazardous Waste Section Post Office Box 27687 Raleigh, North Carolina 27611-7687



Reference: REVISED PART A POST CLOSURE PERMIT APPLICATION

FORMER ASHEVILLE DYEING AND FINISHING

SWANNANOA, NORTH CAROLINA EPA ID NUMBER NCD070619663

MID-ATLANTIC ASSOCIATES JOB NO. 562

Dear Ms. Grover:

Attached is a revised Part A Hazardous Waste Permit Application for the Former Asheville Dyeing and Finishing Facility located in Swannanoa, North Carolina. The application has been revised to reflect the current owner and operator status of the site.

If you should have any questions, please do not hesitate to call me at (919) 250-9918.

Sincerely,

MID-ATLANTIC ASSOCIATES, P.A.

Kirk B. Pollard, P.G.

Senior Project Manager

Kirk B. Bollard

Cc: Jason Pontnack - Culligan International

Enclosure

KP/aso

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The facility is a manufacturing facility which knits, dyes, and finishes fabrics for the screen print industry. The facility produces cotton and poly-cotton circular knit fabrics.

XII. Process Codes and Design Capacities

- A PROCESS CODE: Enter the code from the list of process codes below that best describes each process to be used at the facility.

 Thirteen lines are provided for entering codes, if more lines are needed, attach a separate sheet of paper with the additional information. For other processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item XIA
- PROCESS DESIGN CAPACITY For each code entered in column A, enter the capacity of the process.

 1. AMOUNT Enter the amount, in a case where design capacity is not applicable (such as in a closura/post-closure or enforcement, action) enter the total amount of waste for that process.
- 2 UNIT OF MEASURE For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes
 the unit of measure used. Only the units of measure that see listed below that describes the unit of measure used. Only the units of measure that are listed below should be used.

CODE	CESS E PROCESS	MEASURI	PIATE UNITS OF E FOR PROCESS IN CAPACITY	PROC CODE		ESS	APPROPRIÀTE UNITS OF MÉASURE FOR PROCESS DESIGN CAPACITY
_	Discossi:			T87	Smelting, Meit	ing.	
D79	Underground Injection	Gallons; Liter or Liters Per i	s; Gailons Per Day;	Tê8	Or Refining Fu Titanium Dioxi		
D80	Landfill	Acre-feet or F		700	Chiorida Proci		
D81	Land Treatment	Acres or Hech			Oxidation Rea		
D82	Ocean Disposal	Gallons Per L	ay r Liters Per Day	789 T	Methane Refor		Gailons Per Day; Liters Per
D83	Surface Impoundment	Gallons or Lit	ars		Furnace	· •	Day: Pounde Per Hour; Short
D99	Other Disposal	Any Unit of M	leasure Listed Below	790	Pulping Liquo		Tons Per Hour, Kilograms
	Storage:			M	Recovery Furn		Per Hour, Metric Tons Per
S01	Container	Gallons of Lit	herx	791	Combustion D		
	(Barrel, Drum, Etc.)				Used in The R		Day; Metric Tons Per Hour;
S02	Tank	Gailons or Lit	tera		Of Sulfur Value Spent Sulfuric		Short Tone Per Day; or Btu's
S03	Waste Pile	Cubic Yards (or Cubic Meters	792	Halogen Acid :		Per Hour
504	Surface Impoundment	Gallons or Lit		753	Other Industria		
S05	Drip Pad	Gallons or Lit		M	Furnaces Liste		
S0 6	Containment	Cubic Yards (or Cubic Meters	(N	40 CFR \$260.1		
S99	Building-Storage Other Storage	4	lander Dalane	₩ T94	Containment	-	Cubic Yards or Cubic Meters
-195	_	Any unit of M	leasure Listed Below	M	Building-Treat	ment	
-	Treatment:				Miscellaneous	•	
101	Tank		ay or Liters Per Day	100			A man d to the and Address over 3 fortands
T02 T03	Surface Impoundment Incinerator		Day or Liters Per Day or Hour: Metric Tons	X01	Open Burning Detonation	<i>r</i> opan	Any Unit of Measure Listed Below
.03	A VOLUME STOR		lions Per Hour; Liters	X02	Mechanical Pr		Short Tons Per Hour: Metric
			Btu's Per Hour		ma-igines) / i	ocatany	Tons Per Hour, Short Tons
T04	Other Treatment		Pay; Litera Per Day;				Per Day; Metric Tone Per Day
			lour: Short Tons Per	M			Pounds Per Hour; or
		Hour: Kilogra	ms Per Hour: Metric				Kilograms Per Hour
		Tone Per Day	r, Metric Tons Per	X03	Thermal Unit		Gallons Per Day; Liters Per
		Hour, Short 1	ons Per Day; or				Day; Pounds Per Hour; Short
		Btu's Per Hou		H			Tons Par Hour, Kilograms Pe
T80	Boiler	Gallons or Lit	-	H	•		Hour, Metric Tons Per Day;
T81	Cament Kiln	Gallona Per L	ay; Liters Per Day;				Metric Tons Per Hour; Short Tons Per Day; or Blu's Per
T82 T83	Lime Klin Aggregate Klin		lour; Short Tons Per	M			Hour
784	Phosphate Kiln		ms Per Hour; Metric	X04	Geologic Repo	nettory	Cubic Yards or Cubic Meters
T85	Coke Oven		r, Metric Tons Per Tons Per Day; or	X99	Other Subpart		Any Unit of Measura Listed
T86	Blast Furnace	Btu's Per Hot				· 	Below
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- A: EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 GFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 GFR, Part 261 Subpart D, enter the four-digit number(s) from 40 GFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those texas dous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A eatimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used

 and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	κ
TONS	τ	METRIC TONS	м

if facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the wests.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A, on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant embred in column A, select the code(s) from the list of process codes contained in item XII A, on page 3 to indicate all the processes that will be used to store, treat, and/ or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- 1. Enter the first two as described above.
- Enter "000" in the extreme right box of item XIV-D(1).
- Enter in the space provided on page 7, item XIV-E, the line number and the additional code(s).
- PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2));

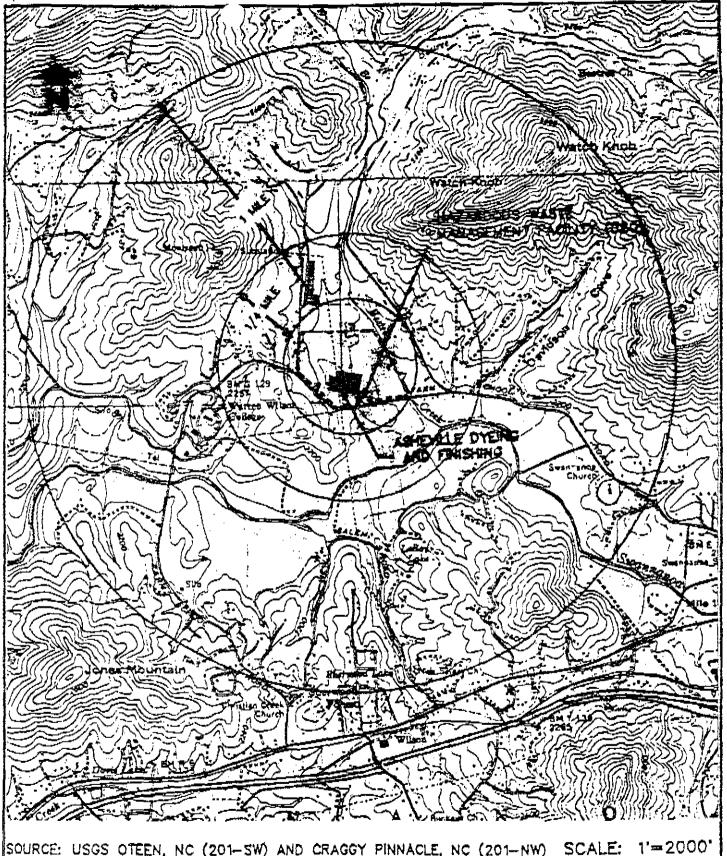
NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shell be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns
 B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste.
 In column D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corresive only and there will be an estimated 200 pounds per year of each waste. The other waste is corresive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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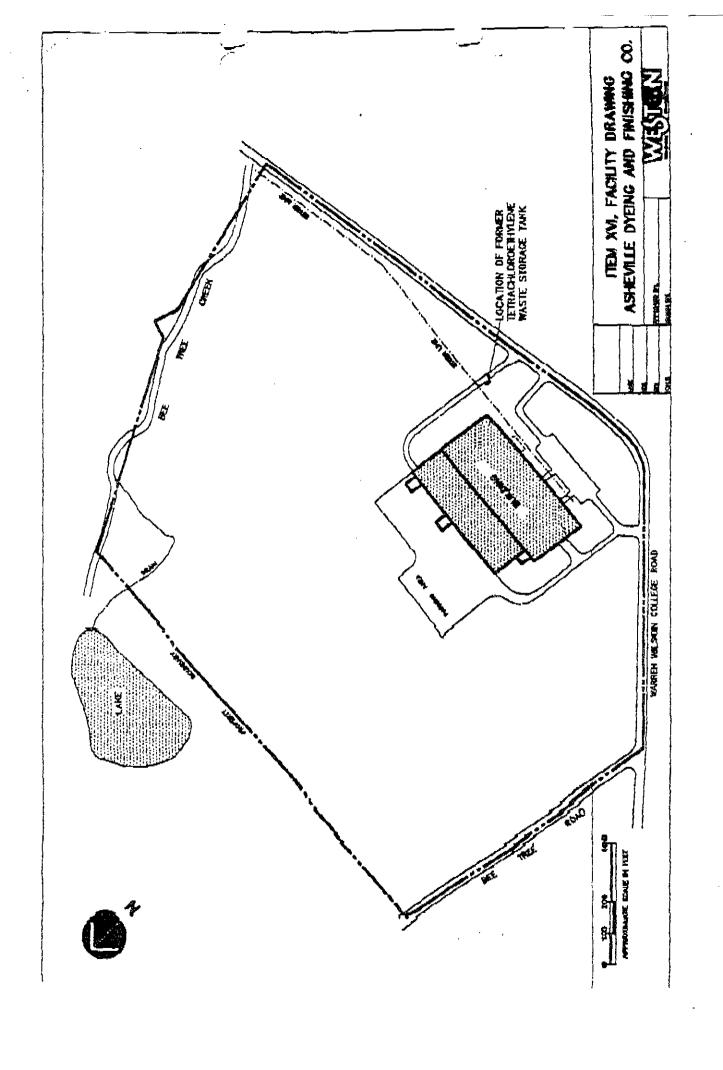


SOURCE: USGS OTEEN, NC (201-SW) AND CRAGGY PINNACLE, NC (201-NW) SCALE: 1'=2000'

R = PROPERTY LINE

SITE LOCATION N 82 25' 56" W 35 36' 44"

ITEM XV. MAP



Amended Part A Application Asheville Dyeing & Finishing Swannanoa, North Carolina January 26, 1994

ITEM XVII. PHOTOGRAPHS



SITE OF FORMER UNDERGROUND STORAGE TANK PII (D80 LANDFILL) 28 JUNE 1990

Amended Part A Application Asheville Dyeing & Finishing Swannanoa, North Carolina January 26, 1994

ATTACHMENT

ITEM III.D. FACILITY EXISTENCE DATA

Current hazardous waste compliance activities for the facility, including this amended Part A application, are a result of the Administrative Order on Consent entered between Winston Mills, Inc. and the North Carolina Department of Environment, Health, and Natural Resources on 29 August 1990. The date of commencement of hazardous waste operations at the facility, as requested in Item III.D. of the Part A application, does not readily apply to this specific hazardous waste compliance activity. The following passage from the "Stipulations and Findings of Fact," as contained in the Administrative Order or Consent, more accurately depicts the date of hazardous waste activity at the facility:

"The Hazardous Waste Section allows that prior to April 1985, as part of a dry cleaning process at the site, the prior owner/operator of the Asheville Dyeing & Finishing site utilized a raw material underground storage tank and a hazardous waste underground storage tank, both for the storage of tetrachloroethylene. In April 1985, the tanks were removed. Soil samples were collected from the bottom of the tank pits and analyzed by Environmental Testing, Inc. for the presence of solvents. Sample analysis results indicated detectable levels of 1,1,2trichloroethylene in the soil beneath the tanks. In addition, approximately 14 years ago, an alleged spill of solvent by the previous owner/operator, consisting primarily of tetrachloroethylene occurred at the facility and it is believed that some of the solvent entered an 8-inch drain pipe and followed this pipe to Bee Tree Creek, approximately 1100 feet east of the plant building. Most of the solvent reportedly entered the ground. In 1988, Westinghouse Environmental Services collected soil samples from the site. The samples were analyzed by Industrial and Environmental Analysis, Inc. for volatile organics. Three hazardous constituents were reported in the results: acetone, methylene chloride, and tetrachloroethylene. From the alleged actions of the previous owner/operator, the trichloroethylene, tetrachloroethylene, and methylene chloride contamination in soils at the site constitutes either the disposal of listed hazardous wastes (F001, F003) or the presence of hazardous constituents, as defined in 40 CFR 260.10, codified at 10 NCAC 10F.0002 and 40 CFR 261, codified at 10 NCAC 10F.0029. For the purpose of this order, the Waste Management Unit (the Unit) is the hazardous waste underground storage tank described above. The facility neither admits nor denies any of the allegations set out in this paragraph."

EPA ID No. NCD070619663

Amended Part A Application Asheville Dyeing & Finishing Swannanoa, North Carolina January 26, 1994

This amended Part A application, as filed herein, addresses the underground storage tank pit area where waste tetrachloroethylene was formerly stored.

ITEM XII. PROCESS CODES AND DESIGN CAPABILITIES

Volume of D80 landfill based on estimated dimensions of former underground storage tank pit of 10 ft. x 20 ft. x 10 ft. deep.

ITEM XIV. <u>DESCRIPTION OF HAZARDOUS WASTES</u>

Estimated quantity of waste based on assumption of maximum 1,1,2-trichloroethylene concentration in soil of 1 mg/kg over a 10 ft. x 20 ft. x 1 ft. deep area (i.e. soil immediately underlying previous underground storage tank). This waste represents leakage or spillage associated with operation of an underground storage tank taken out of service in March 1985. The estimated quantity is a conservative, cumulative total of trichloroethylene potentially present in subsurface soils. No additional trichloroethylene wastes are being or will be generated.

ITEM XV. MAP

According to "Geology and Groundwater Resources of the Asheville Area, North Carolina" (Trapp, 1970), four privately-owned wells are located within the immediate vicinity of the facility. Two of these wells are reported to be observation wells; use of the remaining two wells is not identified. However, none of the wells are located within 1/4-mile of the facility. The C.D. Owens Company, located within 1/4-mile of the facility, owns and operates several wells on its property; however, these wells are reportedly used for industrial purposes.